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7 Attorney for Jeremy Higgins
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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 JEREMY HIGGINS,
15 Defendant.
16

Case No. 15-cr-161-APG-VCF

UNOPPOSED MOTION TO
MODIFY PRETRIAL RELEASE
CONDITIONS

(EXPEDITED TREATMENT REQUESTED)

17 Jeremy Higgins moves this Court to modify his pretrial release conditions by replacing
18 his halfway house residential condition with home confinement with location monitoring.

19 DATED this 21st day of May, 2018.

20 RENE L. VALLADARES
21 Federal Public Defender

22 By: /s/Raquel Lazo

23 RAQUEL LAZO
24 Assistant Federal Public Defender
25 Attorney for Jeremy Higgins
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1 **POINTS AND AUTHORITIES**

2 On May 16, 2018, this Court released Mr. Higgins on a personal recognizance bond
3 with conditions. ECF No. 61. As part of his conditions, Mr. Higgins was ordered to reside at
4 the halfway house pending his revocation hearing. At his detention hearing, defense counsel
5 noted that Mr. Higgins's leg was likely infected. Following the detention hearing, Mr. Higgins
6 was hospitalized briefly due to complications with his leg. As it turns out, Mr. Higgins will
7 have surgery on his leg this week. In order to avoid any increased infection and to permit for a
8 full recovery, Mr. Higgins requests modification of his release conditions so that he can reside
9 at his parent's residence pending his hearing.

10 Defense counsel has spoken with the government and Mr. Higgins's probation officer,
11 Tawni Salem. Neither has any opposition to this request. Ms. Salem requests home
12 confinement with home detention. She further requests location monitoring (with the form of
13 location technology monitoring to be determined by probation).

14 Dated this 21st day of May, 2018.

15 Respectfully submitted,

16 RENE L. VALLADARES
17 Federal Public Defender

18 By: /s/Raquel Lazo

19 RAQUEL LAZO
20 Assistant Federal Public Defender
21 Attorney for Jeremy Higgins
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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA
3

4 UNITED STATES OF AMERICA,
5 Plaintiff,
6 v.
7 JEREMY HIGGINS,
8 Defendant.
9

Case No. 15-cr-161-APG-VCF

PROPOSED ORDER

10 IT IS HEREBY ORDERED that Defendant Jeremy Higgins's pretrial release condition
11 is modified to remove the condition that he reside at the halfway house pending his revocation
12 hearing. Mr. Higgins will instead be subject to home confinement with location monitoring.
13 Mr. Higgins will be restricted to his parent's residence at all times except for employment,
14 education, religious services, medical, substance abuse, or mental health treatment, attorney
15 visits, court appearances, court-ordered obligations, or other activities as pre-approved by the
16 probation officer. Probation will determine which form of location monitoring technology to
17 utilize in order to monitor Mr. Higgins's restriction on movement in the community. Mr.
18 Higgins will pay the costs associated with location monitoring.

19 DATED this ____ day of May, 2018.

20 IT IS SO ORDERED.

RENE L. VALLADARES
Federal Public Defender

21 DATED: May 22, 2018

By: /s/ Raquel Lazo

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24 C.W. HOFFMAN, JR.
25 UNITED STATES MAGISTRATE JUDGE
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RAQUEL LAZO
Assistant Federal Public Defender
Attorney for Jeremy Higgins

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That on May 21, 2018, he served an electronic copy of the above and foregoing

UNOPPOSED MOTION TO MODIFY PRETRIAL RELEASE CONDITIONS
(EXPEDITED TREATMENT REQUESTED) by electronic service (ECF) to the person
named below:

/s/ Brandon Thomas
Employee of the Federal Public Defender